

Robert C. Seldon, Esq

From: Truong, John (USADC) [John.Truong@usdoj.gov]
Sent: Tuesday, May 16, 2006 5:35 PM
To: Robert C. Seldon, Esq
Subject: RE: Elion v. Jackson

Bob:

Here is our agreed upon deposition schedule (subject to confirmation where noted).

1. Mr. Phelps on May 31, 2006, at 1pm (confirmed)
2. Mr. Stephens on June 26, 2006, at 2pm (subject to confirmation)
3. Ms. Elion on June 30, 2006, at 9:30am (confirmed)
4. Mr. Heist on July 5, 2006, at 1pm (subject to confirmation)

I'll confirm 2 and 4 for you as soon as I can.

John

John C. Truong
Assistant United States Attorney
555 4th Street, N.W.
Room E-4206
Washington, D.C. 20530
(202) 307-0406 (direct)
(202) 514-8780 (facsimile)
john.truong@usdoj.gov

From: Robert C. Seldon, Esq [mailto:rcs@rcseldon-associates.com]
Sent: Tuesday, May 16, 2006 5:01 PM
To: Truong, John (USADC)
Subject: RE: Elion v. Jackson

John – I thought that I addressed this specifically in my letter and in our phone calls.

Ms. Elion isn't available to assist me in depositions the second week in July, which is after the discovery period closes and the only dates that you've informed me that Mr. Heist and Mr. Stephens will make themselves available.

Please review my letter, as this spells out our position and willingness to work with you.

Regards,

Robert C. Seldon, Esq.

6/8/2007